UNITED STATES DEPARTMENT OF JUSTICER MINA! DIVISION

WASHINGTON, D.C. 20530

Form OBD-68 (Rev 10-14-76) Formerly DJ-307 for JAN 8 5 03 PH '82
INTERNAL SECURITY
SECTION
REGISTRATION UNIT

AMENDMENT TO REGISTRATION STATEMENT

Pursuant to the Foreign Agents Registration Act of 1938, as amended.

1. Name	of Registrant	2. Registration No.
MUDGE	ROSE GUTHRIE & ALEXANDER	3200
3. This	amendment is filed to accomplish the follo	owing indicated purpose or purposes:
[X To correct a deficiency in	To give a 10-day notice of a change in information as required by Section 2(b) of the Act.
	Initial Statement	
	X Supplemental Statement for August 18, 1981	Other purpose (specify)
C	To give notice of change in an exhibit previously filed.	
4. If this	s amendment requires the filing of a docume	ent or documents, please list-
specif more		euestion 11 and 12.
amendme	• • • • • • • • • • • • • • • • • • • •	as (they have) read the information set forth in this he contents thereof and that such contents are in their knowledge and belief.
to before a minister of or by a ma persons pe	opies of this amendment shall be signed and so a notary public or other person authorized to ac aths by the agent, if the registrant is an indivi- jority of those partners, officers, directors or erforming similar functions who are in the Unite the registrant is an organization.)	idual,
Subscribe	ed and swom to before me at	
this	_day of, 19	(Notary or other officer)
My commi	ission expires	

RECEIVED CRIMINAL DIVISION

JAN 3 5 04 PH 182

January 8, 1982 Registration No. 3200

INTERPRESENTUROYSUPPLEMENTAL STATEMENT REGISTRATION UNIT Exhibit A

Addendum to Ouestions 11 and 12

Registrant, in filing its Supplemental Statement believed, and continues to believe, that its activities in connection with its legal representation of Creusot-Loire, S.A. are exempt from registration under exemption (g), but registered as a precaution in the event that it might engage in non-exempt activities. It has not. Its representation of Creusot-Loire, S.A. was disclosed to all participating agencies and all government officials with whom Registrant's attorneys discussed this matter. All contacts with government officials were directly related to the proceedings initiated by the Office of Foreign Assets Control of the Department of Treasury, and did not include non-exempt "political activities."

In response to the request of the Department of Justice in its letter of December 9, 1981, however, Registrant voluntarily sets forth hereunder a list of all 1981 meetings shown in Registrant's records with government officials in connection with the issues raised in the <u>Federal Register</u> notice of November 17, 1980, 45 FR 75834. Mr. William Walker participated in all meetings on behalf of Registrant; Messrs. David Vaughan, William Laino, and Marc Miller participated in some of the meetings on behalf of the Registrant.

DATE

NAME

TITLE

1/9/81

Thomas A. Enders

U.S. Ambassador to the Commission of the EC

1/21/81	Myer Rashish	Under Secretary of State for Economic Affairs-designate
2/5-6/81	Ambassador Robert D. Hormats	Deputy U.S. Trade Representative
	Myer Rashish	see above
	Dennis O'Connell	Director, Office of Foreign Assets Control
	William E. Brock	U.S. Trade Representative
	Frank C. Carlucci	Deputy Secretary of Defense
2/27/81	Richard Davis	Assistant Secretary of the Treasury
	Dennis O'Connell	see above
	Susan Swinehart	Director of Licensing, Office of Foreign Assets Control
3/1/81	Dennis O'Connell	see above
3/21/81	John Walker	Assistant Secretary of the Treasury
3/21/81	Dennis O'Connell	see above
	Robert D. Hormats	Assistant Secretary of State for Economic and Business Affairs- designate
4/17/81	Mark Leland	Assistant Secretary of the Treasury
	Robert D. Hormats	see above

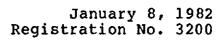
Each such meeting took place in the direct context of an effort to secure removal of the exclusion order issued against nickel-bearing stainless steel from Creusot-Loire, and were undertaken in the course of agency proceedings.

This proceeding was initiated in furtherance of enforcement of the Cuban Assets Control Regulation, 31 C.F.R. § 515, which



excludes products of Cuban origin from entering U.S. commerce, a policy which was not then, and is not now, in question. In the course of these proceedings and the meetings listed above, no attempts were made to influence or persuade officials with reference to formulating, adopting, or changing the domestic or foreign policies of the United States concerning the policy of excluding products of Cuban origin from the United States, or with reference to the political or public interests, policies or relations of the government of a foreign country or a foreign political party concerning entry of materials of Cuban origin to U.S. commerce. Among the issues discussed in the meetings listed above was a certificate of origin procedure to permit the entry into the U.S. of nickel-bearing stainless steel from Creusot-Loire which does not contain nickel of Cuban origin.

The last phrase in response to Question 11 should be amended to read "and participation in meetings with officials of OFAC, USTR, and the Departments of Treasury, State, and Defense."



AMENDMENT TO SUPPLEMENTAL STATEMENT

Exhibit B

Question 15(a)

-			
Date	To Whom	Purpose	Amount
12/1/80- 8/31/81	Park Avenue Travel Eastern Airlines	Air Fares	\$ 9,908.00
	XYZ Cab Co. Local Transportation Hertz - Car Rental	Local Transportation	5,468.74
	Archer Air Courier Network Air Courier Federal Express	Delivery Services	1,331.15
	Western Union International C&P Telephone New York Telephone ITT World Communications Western Union RCA Global Communications Stenographic overtime, and meals during stenog- raphic overtime; attorney meals while working on matter	Communications	4,585.63
·		overtime and over- time meals	2,568.64
	Office Expenses: Document reproduction services, postage, filing fees, Lexis (Research), Word Processing	office expenses	16,183.62
	Expense (exclusive of air fares) for four trips for lawyers from New York to Paris, France and return, nine trips for lawyers from New York to Washington, D.C. and return (Wm. N. Walker and Wm. P. Laino)	travel	£ 120 90
		CIUACI	6,130.89
	Total 12/1/80 - 8/31/81		\$46,176.67



1701 PENNSYLVANIA AVENUE, N.W.

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202-298-5970

January 18, 1982

ROBERT A. CANTOR DAVID A. VAUGHAN RESIDENT PARTNERS

CABLE ADDRESS **BALTUCHINS-WASHINGTON**

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Mr. Joseph E. Clarkson U.S. Department of Justice Chief Registration Unit Internal Security Section Criminal Division 315 9th Street, N.W. Room 100 Washington, D.C.

> Registration No. 3200 Re:

Dear Mr. Clarkson:

Enclosed herewith are two executed originals of the Amendment to Registration Statement of this firm which you requested in your letter of December 9, 1981, and which we provided to you in its final but unexecuted form on January 8, 1982.

If you have any questions about this Amendment, please call me.

Marc E. Miller

Enclosure

HAND DELIVERY

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FRANCIS X. MALONEY
JAMES P. MARLIN
GEORGE J. MARTIN, JR.
J. ROGER MENTZ
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